

EXHIBIT 15

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2022 JAN 18 PM 5:00
CLERK'S OFFICE [illegible]

RESPONSE TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name: Nelson Heredia Alvarez

Mailing Address 103 Calle Caparra

Cataño PR 00962

Contact Phone Home: _____ Cell (787) 312-9457

II. Caption *Claim # 176410*

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283-LTS

D. Omnibus Objection regarding request for amounts not paid by the Commonwealth of Puerto Rico:

Number of proofs of claim:

Act 89 – Uniform Compensation – July 1979

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Mrs. Sila Calderón – effective January 2004

III. The court should not rule in favor of the Omnibus Objection, because these amounts are owed based on the passing of the following laws by the government of the Commonwealth of Puerto Rico:

Act 89 – Uniform compensation – July 1979

Act 89 “*Romerazo*” – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

IV. Supporting Documentation

Enclosed are documents evidencing the years of service with the Puerto Rico Telephone Company, ~~Ponce Levittown~~, Puerto Rico, from the 11th of November of 1974 through the 4th of September of 1999. I finished my career as a Splicer with the Puerto Rico Telephone Company, ~~Ponce Levittown~~, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of ~~education~~ service.

Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Nelson Heredia Alvarez

Printed name

[signature]

Signature

PS I do not agree with my claim being considered for dismissal, given that the PRTC was a government agency until 1999, when it was sold by the governor in office at the time, and it became private. The basis of my claim is money owed for wage increases under laws enacted during the time that the PRTC belonged to the Commonwealth.

Respectfully,

[signature]

Nelson Heredia Alvarez

Case:17-03283-LTS Doc#:19825-1 Filed:01/18/22 Entered:01/19/22 15:56:06 Desc:
Exhibit Page 1 of 1



PRT/CLARO
P.O. Box 360998
San Juan PR 00936-0998

CERTIFICATION

NELSON HEREDIA ALVAREZ
XXX-XX-3891

For the former employee referenced above, we certify the following:

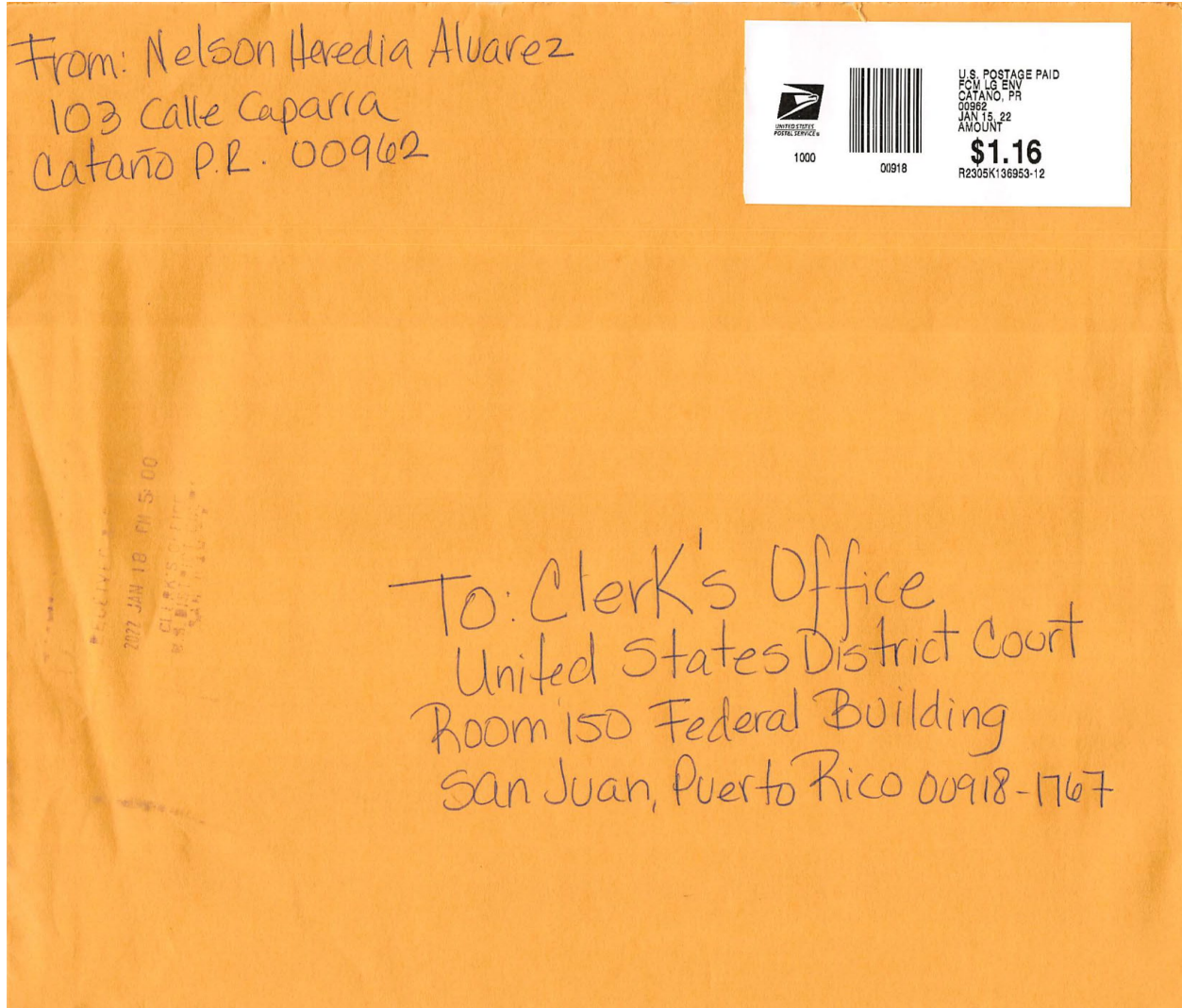
- He began at PRT/Claro effective 11/11/1974.
- He worked as a regular employee through 09/04/1999.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on 9/20/2020.

González

Abigail Alejandro

Abigail Alejandro González
Compensation Officer
Compensation and Records





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TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 176410 DN 19825**

Signed this 2nd of June 2022



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor', written over a horizontal line.

Andreea I. Boscor

